

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF TEXAS, et al.,

Defendants.

LAS AMERICAS IMMIGRANT
ADVOCACY CENTER; AMERICAN
GATEWAYS; and THE COUNTY OF EL
PASO, TEXAS,

Plaintiffs,

v.

STEVEN C. MCCRAW, in his official
capacity as Director of the State of Texas
Department of Public Safety, and BILL D.
HICKS, in his official capacity as District
Attorney for the 34th District,

Defendants.

**CASE NO. 1:24-cv-00008-DAE
(LEAD CASE)**

CONSOLIDATED WITH
1:23-cv-01537-DAE

**UNOPPOSED MOTION TO WITHDRAW TAMARA F. GOODLETTE
AS COUNSEL FOR PLAINTIFFS LAS AMERICAS IMMIGRANT ADVOCACY
CENTER AND AMERICAN GATEWAYS**

Undersigned counsel, Tamara F. Goodlette of the Texas Civil Rights Project, respectfully
moves to withdraw her appearance as counsel for Plaintiffs Las Americas Immigrant Advocacy
Center and American Gateways due to the upcoming conclusion of her employment with the Texas

Civil Rights Project. Las Americas Immigrant Advocacy Center and American Gateways will continue to be represented by the other attorneys from Texas Civil Rights Project who have entered appearances in this case. Counsel for the other parties in this action stated that those parties do not oppose this motion.

Date: March 12, 2025

Respectfully submitted,

/s/ Tamara F. Goodlette

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Attorneys for Plaintiffs Las Americas Immigrant Advocacy Center and American Gateways

CERTIFICATE OF SERVICE

I certify that a copy of this filing was served on the other parties to this action and their counsel of record through electronic filing in the Court's ECF system on March 12, 2025.

/s/ Tamara F. Goodlette

Tamara F. Goodlette